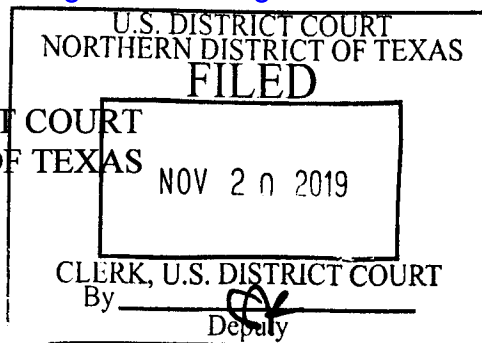


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



UNITED STATES OF AMERICA

v.

TRIVIKRAM REDDY

NO.

FILED UNDER SEAL

INDICTMENT

The Grand Jury charges:

3 - 19CR - 597 - E

At all times material to this Indictment:

Introduction

1. From in or about January 2, 2014 and continuing until in or about June 2019, defendant **Trivikram Reddy** engaged in an illegal scheme to unlawfully enrich himself by submitting and causing the submission of false and fraudulent claims to Medicare for medical procedures that were either not performed at all or not performed by the provider claimed.
2. **Trivikram Reddy** was a nurse practitioner licensed in the State of Texas on or about November 16, 2011.
3. **Trivikram Reddy** owned and operated multiple medical clinics in Ellis County, Texas, within the Dallas Division of the Northern District of Texas, under the names VCare Health Services, PLLC; Texas Care Clinics, PLLC; and, Waxahachie Medical, PLLC.
4. Persons A, and B, each known to the Grand Jury, were licensed medical doctors in the State of Texas.

Count One

Conspiracy to Commit Health Care Fraud
[Violation of 18 U.S.C. § 1349 (18 U.S.C. § 1347)]

5. The grand jury realleges and incorporates by reference the allegations contained in paragraphs 1 through 4 of this Indictment as if fully set forth herein.

6. From in or about January 2, 2014 and continuing to in or about June 2019, the exact dates being unknown to the Grand Jury, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant, **Trivikram Reddy**, did knowingly and willfully combine, conspire, confederate and agree with persons known and unknown to the Grand Jury to commit offenses against the United States, that is, to knowingly and willfully execute a scheme and artifice to defraud a health care benefit program affecting commerce, as defined in Title 18, United States Code, Section 24(b), that is, Medicare, and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, said health care benefit program in connection with the delivery of and payment for health care benefits, items and services, in violation of 18 U.S.C. § 1347.

7. The object of the conspiracy and scheme and artifice to defraud was for **Trivikram Reddy** and others to unlawfully enrich themselves by, among other things, submitting and causing the submission of false and fraudulent claims to Medicare for medical procedures that were either not performed at all or not performed by the provider claimed.

8. In furtherance of the conspiracy and scheme and artifice to defraud, **Trivikram Reddy** employed multiple medical doctors, including Persons A, and B, to

serve in the role of supervising physician for VCare Health Services, PLLC, Texas Care Clinics, PLLC, and Waxahachie Medical, PLLC.

9. **Trivikram Reddy**, and persons known and unknown to the Grand Jury, billed Medicare for medical procedures purportedly provided by Persons A and B, to Medicare beneficiaries residing in the Northern District of Texas (a) without providing the procedure and (b) without the supervising physicians seeing, speaking to, or otherwise communicating with or examining them.

All in violation of 18 U.S.C. § 1349 (18 U.S.C. § 1347).

----- NOTHING FURTHER ON THIS PAGE -----

Forfeiture Notice
(18 U.S.C. § 982 (a)(7) and 28 U.S.C. § 2461(c))

Upon conviction of the offense alleged in Count One of this Indictment, and pursuant to 18 U.S.C. § 982(a)(7) in conjunction with 28 U.S.C. § 2461(c), defendant **Trivikram Reddy** shall forfeit to the United States of America all property constituting or derived from proceeds traceable to the respective offense, including a “money judgment” in the amount of U.S. currency constituting the proceeds traceable to the scheme alleged in the offense.

----- NOTHING FURTHER ON THIS PAGE -----

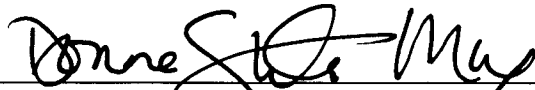
Pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), if any of the above property subject to forfeiture, as a result of any act or omission of the defendant, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, it is the intent of the United States of America to seek forfeiture of any other property of the defendant up to the value of the above described property subject to forfeiture.

A TRUE BILL



FOREPERSON

ERIN NEALY COX
UNITED STATES ATTORNEY



DONNA STRITTMATTER MAX
Assistant United States Attorney
Texas State Bar No. 24041984
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Telephone: 214-659-8664
Facsimile: 214-659-8802
Email: donna.max@usdoj.gov

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

TRIVIKRAM REDDY

SEALED INDICTMENT

18 U.S.C. § 1349 (18 U.S.C. § 1347)
Conspiracy to Commit Health Care Fraud
(Count 1)

18 U.S.C. § 982 (a)(7) and 28 U.S.C. § 2461(c)
Forfeiture Notice

1 Count

A true bill rendered

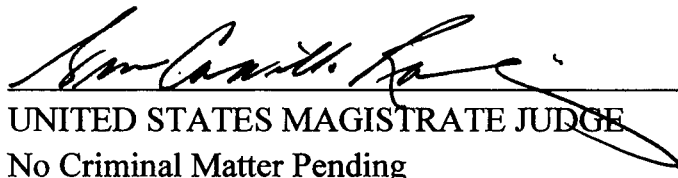


DALLAS

FOREPERSON

Filed in open court this 20 day of November, 2019.

Warrant to be Issued



UNITED STATES MAGISTRATE JUDGE
No Criminal Matter Pending